



16-HAB-0020

JUN 09 2016

Mr. Steve Hudson, Chair
Hanford Advisory Board
Enviroissues Hanford Project Office
713 Jadwin, Suite 3
Richland, Washington 99352

Dear Mr. Hudson:

HANFORD ADVISORY BOARD (Board) ADVICE #287, "CENTRAL PLATEAU MILESTONE SERIES CHANGE PACKAGE"

Thank you for the Board's advice on the proposed changes to the Tri-Party Agreement (TPA) Central Plateau milestone series. The TPA agencies – U.S. Department of Energy (DOE), U.S. Environmental Protection Agency (EPA) and the Washington Department of Ecology (Ecology) – have provided point-by-point responses to the Board's advice points below.

Advice Point #1: The Board advises the TPA agencies to meet legal obligations by negotiating more stringent deadlines in an effort to demonstrate the priority of this work to Congress and drive adequate funding for Hanford cleanup.

Response: The TPA agencies agree with this advice. Our goal for these changes was to negotiate aggressive, yet achievable milestones that continue steady cleanup progress at Hanford.

Advice Point #2: The Board advises DOE to seek adequate resources for all proposed cleanup activities.

Response: DOE agrees with this advice. As part of the annual Federal appropriations process, DOE will continue to identify and request the full funding required to comply with TPA commitments.

Advice Point #3: The Board advises DOE to expedite the new M-016-250 milestone (3/31/2016) in order to support efforts to influence the FY 2017 Federal budget planning process, show progress, keep trained crews together for remove-treat-dispose work, and to take advantage of "shovel ready work".

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Response: While the TPA agencies agree with this advice, sufficient time was not available to integrate this proposed milestone into the FY 2017 Federal budget planning process. However, a list of waste sites for implementing removal actions has been agreed to by Ecology and DOE.

Advice Point #4: The Board advises the TPA agencies to set a specific, achievable date for the M-016-00 milestone and to cease the practice of publishing "To Be Determined" as a place mark for a completion date. The goal should be to establish specific, achievable milestones within a process that allows for changing milestones when necessary.

Response: The TPA agencies agree with the advice and have revised the M-016-00 milestone to include a date of 9/30/2042.

Advice Point #5: The Board advises the TPA agencies to adjust proposed milestones to reflect an acceleration of the M-015-00 and M-016-00 milestones series which cover the investigation and remediation of non-tank farm/non-canyon waste sites located in the 200 Areas, ahead of M-085 work related to demolishing plans to demolish U Canyon and close B Pond, S Pond, and NRDWL. In addition, with regards to M-015-00 and M-016-00 milestone sites with below ground contamination, the TPA agencies should consider temporarily delaying capping to allow for future deep vadose zone remediation.

Response: The TPA agencies agree with this advice and have revised the milestones to reflect the lower priority to demolish U Canyon and close B Pond, and S Pond. The TPA agencies received verbal comments to expedite work on the burial grounds/unlined trenches (200-SW-2 Operable Unit), and have added a new milestone to initiate characterization of the radioactive solid waste burial grounds. The TPA agencies currently do not have capping milestones other than for the U Plant Canyon scheduled in 2027.

Advice Point #6: The Board advises the TPA agencies to negotiate earlier milestone dates for the cleanup of the 324 Building and initiate remediation of the plume beneath the Building. Extremely high radiation levels and proximity to the Columbia River and to the people living within the boundary of the City of Richland morally obligates near-term action.

Response: The TPA agencies agree with this advice. Demolition of the 324 Building or completing cleanup of the entire 300-296 waste site cannot be accelerated before 2021; however, we are able to comply with this request for an earlier milestone due date to initiate remediation of the waste site. The new milestone establishes that DOE will complete remote excavations (i.e., removing the high-rad portion of the waste site) by 2019.

Advice Point #7: The Board supports the newly proposed milestone M-016-086 (9/30/21) for cleanup of the 618-11 burial ground.

Response: The TPA agencies appreciate the Board's support. DOE and EPA will continue planning for this work and will keep the Board informed as needed.

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Advice Point #8: The Board advises the TPA agencies to expeditiously investigate whether the PUREX tunnels pose a high risk, and if so, to then negotiate milestones to begin planning for their remediation.

Response: The TPA agencies agree with this advice, and have established a new milestone (M-085-80A) for submittal of data quality objectives report for assessing the structural integrity of PUREX storage tunnels 1 and 2. The milestone due date is 9/30/2017.

Advice Point #9: The Board advises DOE to move the WESF cesium and strontium capsules into dry storage. These capsules pose a very high risk. Proposed milestone changes should be adjusted accordingly to better reflect this higher priority.

Response: The TPA agencies agree with this advice, and the existing milestone M-92-05 due date of 6/30/2017 reflects this priority. M-92-05 requires DOE to "Determine disposition path and establish interim Agreement Milestones for Hanford Site Cs/Sr capsules." DOE is evaluating these alternatives and will keep the Board informed about this work.

Advice Point #10: The Board advises the TPA agencies to schedule meetings to educate the Board and the public on expectations for cleanup based on year-by-year goals activities for the next decade and beyond. The intent is for the Board and the public to better understand the overall impact of the delays proposed in the change package and to address how DOE intends to mitigate the "bow wave" of unfunded work that has accumulated.

Response: The TPA agencies partially agree with this advice. The agencies understand that early and meaningful public involvement with stakeholders, Tribal Nations, and others strengthens the decision-making process and results in sustainable solutions. Active involvement with the Board and public involvement activities are a key component of the decision-making process. These activities, and the timing for these activities vary based on legal requirements, the scope of the proposed actions, and the values and priorities of our stakeholders, Tribal Nations, and others. In addition to these activities, the TPA agencies conduct an annual workshop that focuses on cleanup priorities and funding needs over a multi-year period that includes the planned actions, expected outcomes, and resource needs.

The DOE Office of Environmental Management's guidance about public involvement is included in the budget development process and is largely modeled after the annual public involvement process conducted at Hanford. Given the tempo of these public involvement activities and the fact that Hanford cleanup is conducted in an environment where appropriations can vary annually, the agencies prefer to focus on the current, institutionalized process and the flexibility it provides to discuss and adjust priorities and planned actions, if necessary, based on appropriations levels. The TPA agencies remain committed to the open and transparent decision-making process concerning Hanford cleanup.

Advice Point #11: The Board advises the TPA agencies to improve the public review and comment process on proposed changes to the TPA or other important cleanup actions, working closely with the HAB's Public Involvement and Communication Committee on the development of materials and presentations describing change packages.

Response: The TPA agencies agree with this advice. When possible, the agencies will provide the preliminary public involvement materials to the Board's Public Involvement and Communications Committee for feedback. It also has been noted in the *Hanford Public Involvement Plan* that, when possible, the TPA agencies will consider input about the design and content of notices from interested stakeholders, the location of a meeting or comment period, while receiving feedback from Board members and the public during the public involvement process. For example, after the Central Plateau Milestone Change Packages public meeting in Richland, the agencies received feedback that was used to modify information materials at three subsequent meetings. Regardless of when feedback comes in, the TPA agencies evaluate the information and make changes, if needed.

Advice Point #12: During future TPA Change Package comment periods, the Board advises the TPA agencies to include supplemental plain language explanations of terminology used throughout the change package in their materials, especially references to buildings, facilities, and waste sites.

Response: The TPA agencies agree with this advice and will continue to work together to develop public involvement materials that use plain language, especially when referencing buildings, facilities and waste sites. Fact sheets and briefings also are created with the change packages, which serve as a basis for agreement among the agencies about specific actions, facilities, and sites. The agencies incorporate feedback received during public comment periods on products developed (e.g., the briefing materials for proposed changes to the Central Plateau milestones). These public comments contributed to improving those materials.

Advice Point #13: The Board advises the agencies to create materials during future TPA Change Package comment periods that make information about the following clear and accessible:

- Rationale for the proposed changes and assumptions that were used to both necessitate the delay and support the new proposed dates;
- Explanation of how the potential for increased risks to the environment, workers, the public, and Tribes were assessed;
- High-level overview of all pending cleanup work at Hanford and where the proposed changes fit within completion of Hanford cleanup;
- Impacts of the delays on estimated long-term cost increases for cleanup.

Response: The TPA agencies agree with this advice and acknowledge that we also received verbal feedback on this point. We appreciate all of the feedback, and we will use it to inform our future public involvement planning related to TPA activities.

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Thank you again for your advice on the proposed TPA milestone changes. We look forward to the Board's continued involvement as Hanford cleanup progresses. If you have any questions, please contact Kristen Holmes at (509) 376-5803 or Kristen.l.Holmes@rl.doe.gov.



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